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October 21, 2011

The Honorable James M. Peck, U.S.B.J. United States Bankruptcy Court Southern District of New York One Bowling Green, Courtroom 601 New York, NY 10004

Attn.: Mary Lopez, Case Administrator

Re:

In re Lehman Brothers Holdings Inc., et al.

Chapter 11 Case No. 08-13555 (JMP)

Response to Debtors' 130th Omnibus Motion, Docket #15363

Claimant: Michael K. McCully

Claim No.: 65949



Dear Ms. Lopez:

This firm represents Michael K. McCully, a claimant in the referenced proceeding whose claims are the subject of the Debtors' 117th and 130th Omnibus Objections. I write because Mr. McCully's Response and Opposition to the Debtors' 130th Omnibus Objection has not been properly filed in the docket.

By notices dated October 19, 2011, both the 117th and 130th Omnibus Objections have been adjourned to December 21, 2011, so the request posed in this letter presents no prejudice to the Debtors.

Attached to this letter is Mr. McCully's response and opposition to the Debtors' 130th Omnibus Objection, docketed as #15363 on March 25, 2011. As indicated by the attached Affidavit of Service, the response and opposition was filed with the Court by mailing to Judge Peck and was served on Weil Gotshal for Debtors, Milbank Tweed for the Unsecured Creditors' Committee, and the Office of the United States Trustee. This filing with the Court and service on the other service parties was done in accordance with the Notice of Hearing on Debtors' 130th Omnibus Objection dated April 18, 2011.

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Honorable James M. Per Page 2 October 21, 2011

All copies were timely delivered on May 18, 2011. I am enclosing copies of the Federal Express air bill for the delivery to Judge Peck and each of the other service parties. Attached to each air bill is a copy of the Proof of Delivery provided by Federal Express. The delivery to Judge Peck was signed for by "K. Su."

I respectfully request that the enclosed response and opposition of claimant Michael K. McCully be entered on the docket in opposition to Debtors' 130th Omnibus Objection.

Thank you for your consideration.

Respectfylly submitted,

Richard J. Schager, Jr

cc: Mr. Michael K. McCully Erika Del Nido, Esq. Robert J. Lemons, Esq. Tracy Hope Davis, Esq. Dennis F. Dunne, Esq.

Enclosure RJS/cb

AFFIDAVIT OF SERVICE

STATE OF NEW YORK) : ss.:
COUNTY OF NEW YORK)

Christine Bodei, being duly sworn, deposes and says:

- 1. I am not a party to this action and I am over eighteen years of age.
- 2. On October 21, 2011 I served the letter of Richard J. Schager, Jr. to the Hon. James M. Peck, (Attn.: Case Administrator Mary Lopez), the Opposition of claimant Michael K. McCully to Debtors' Objection to Claim No. 65946, and enclosures in the matter of *Lehman Brothers Holdings Inc.*, et al. by overnight courier to:

Honorable James M. Peck United States Bankruptcy Court Southern District of New York One Bowling Green Courtroom 601 New York, New York 10004 Erika Del Nido, Esq. Robert J. Lemons, Esq. Weil Gotshal & Manges LLP 767 Fifth Avenue New York, New York 10153

Attn.: Mary Lopez, Case Administrator

Tracy Hope Davis, Esq.
Office of the United States Trustee for Region 2
33 Whitehall Street, 21st Floor
New York, New York 10004

Dennis F. Dunne, Esq.
Milbank, Tweed, Hadley & McCloy LLP
1 Chase Manhattan Plaza
New York, New York 10005

Sworn to before me this 21st day of October, 2011.

RICHARD J. SCHAGER, JR.

NOTARY PUBLIC-STATE OF NEW YORK

No. 02SC4834248

Qualified in Kings County

My Commission Expires March 30, 20(5)

Notar Public